

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

VIRGINIA GIUFFRE,

Plaintiff,

v.

ALAN DERSHOWITZ,

Defendant.

Civil Action No. 1:19-cv-3377 (LAP)

**ADDENDUM TO
AGREED PROTECTIVE ORDER**

ALAN DERSHOWITZ,

Counterclaim Plaintiff,

v.

VIRGINIA L. GIUFFRE,

Counterclaim Defendant.

THIS MATTER comes before the Court pursuant to a joint motion by Defendant Alan Dershowitz, Plaintiff Virginia Giuffre and non-party Ghislaine Maxwell for an Addendum to the Protective Order in order to designate as “Confidential” the redacted¹ settlement agreement from *Giuffre v. Maxwell*, Civil Action No. 15-07433 (“the *Maxwell* Settlement Agreement”). The Court having considered the motion and other matters of record herein, and it appearing to the Court and the Court finding that given that the *Maxwell* Settlement Agreement is by its terms required to be kept confidential; it further appearing to the Court that the interests of justice require the confidentiality of the *Maxwell* Settlement Agreement be maintained; and it further appearing to

¹ The parties to this action have agreed to the production of the *Maxwell* Settlement Agreement with redactions of the identities of certain irrelevant third-parties.

the Court and the Court finding that it is in the public interest to allow the production of the *Maxwell* Settlement Agreement in this litigation, that the need for disclosure outweighs any individual's privacy rights, and that the protections afforded under the Protective Order and this Addendum are adequate to guard the confidentiality of this information.

IT IS, THEREFORE, ORDERED with the consent of the parties that an Addendum to the Protective Order be entered for the purposes of assuring the confidentiality of the *Maxwell* Settlement Agreement, as follows:

1. The Protective Order in this action as entered on December 21, 2020² will govern the production of the *Maxwell* Settlement Agreement.
2. The *Maxwell* Settlement Agreement may be designated "confidential" pursuant to the Protective Order.
3. Pursuant to paragraph 15 of the Protective Order in this action, the signatories to the *Maxwell* Settlement Agreement may petition the Court to restrict the use at trial of the *Maxwell* Settlement Agreement.

² This Addendum incorporates any subsequent modifications to this Protective Order agreed to by the parties or entered by the Court.

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SO ORDERED AND SIGNED this ____ day of _____, 2022.

Hon. Loretta A. Preska
Senior United States District Judge